

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TUDOR INSURANCE COMPANY,

*Plaintiff,*

v.

FIRST ADVANTAGE LITIGATION  
CONSULTING, LLC,

*Defendants.*

FIRST ADVANTAGE LITIGATION  
CONSULTING, LLC,

*Counter-Claimant  
And Cross-Complainant*

vs.

AMERICAN INTERNATIONAL SPECIALTY  
LINES INSURANCE COMPANY, FEDERAL  
INSURANCE COMPANY, TUDOR INSURANCE  
COMPANY, ZURICH AMERICAN INSURANCE  
COMPANY,

*Counter-Claim  
Defendants.*

11 Civ. 3567 (LAK)

**NOTICE OF MOTION TO ADMIT  
MARGARET F. CATALANO PRO  
HAC VICE**

Civil Action

ECF Case

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern Districts of New York, I, Ann Odelson, Esq. a member in good  
standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice  
of:

Applicant's Name: Margaret F. Catalano, Esq.

Firm Name: Carroll, McNulty & Kull LLC

Address: 120 Mountain View Boulevard

P.O. Box 650

City/State/Zip: Basking Ridge, New Jersey 07920

Phone Number: (908) 848-6300

Fax Number: (908) 848-6310

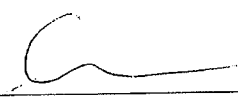
MARGARET F. CATALANO is a member in good standing of the Bar of the States of:

New Jersey  
United States Court of Appeals for the Fourth Circuit

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There are no pending disciplinary proceedings against MARGARET F. CATALANO in any State or Federal court.

Respectfully submitted,



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Ann Odelson, Esq. (AO9681)  
Carroll, McNulty & Kull LLC  
570 Lexington Avenue, 8<sup>th</sup> Floor  
New York, New York 10022  
(646) 625-4000 (telephone)  
(646) 625-4044 (fax)  
email: [aodelson@cmk.com](mailto:aodelson@cmk.com)

Dated: July 7, 2011  
New York, New York

**CERTIFICATE OF SERVICE**

The foregoing NOTICE OF MOTION TO ADMIT MARGARET F. CATALANO PRO HAC VICE was served on the following counsel of record on July 7, 2011 by regular mail via United States Postal Service:

Edward J. Stein, Esq.  
ANDERSON KILL & OLICK, P.C.  
1251 Avenue of the Americas  
New York, New York 10020  
Phone: (212) 278-1745  
[estein@andersonkill.com](mailto:estein@andersonkill.com)  
**Attorneys for Counter-Claimant and  
Cross Complainant First Advantage  
Litigation Consulting, LLC**

Todd R. David, Esq.  
Alexander S. Lorenzo  
ALSTON & BIRD LLP  
90 Park Avenue  
New York, NY 10016  
Phone: (212) 910-9400  
[todd.david@alston.com](mailto:todd.david@alston.com)  
[alexander.lorenzo@alston.com](mailto:alexander.lorenzo@alston.com)  
**Attorneys for Counter-Claim Defendant  
American International Specialty Lines  
Insurance Company**

Kevin T. Coughlin, Esq.  
COUGHLIN DUFFY LLP  
88 Pine Street, 28<sup>th</sup> Floor  
New York, NY 10005  
Phone: (212) 483-0105  
[kcoughlin@coughlinduffy.com](mailto:kcoughlin@coughlinduffy.com)  
**Attorneys for Counter-Claim Defendant  
Zurich American Insurance Company**

Judith F. Goodman, Esq.  
GOODMAN & JACOBS LLP  
75 Broad Street, 30<sup>th</sup> Floor  
New York, NY 10004  
Phone: (212) 385-1191  
[jgoodman@goodmanjacobs.com](mailto:jgoodman@goodmanjacobs.com)  
**Attorneys for Counter-Claim Defendant**

**Federal Insurance Company**



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Ann Odelson  
Carroll, McNulty & Kull LLC  
570 Lexington Avenue, 8<sup>th</sup> Floor  
New York, New York 10022  
(646) 625-4000 (telephone)  
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COMPANY,

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Defendants.*

-----x

State of New York )

ss:

County of New York )

Ann Odelson, being duly sworn, hereby deposes and says as follows:

1. I am a Member at Carroll, McNulty & Kull LLC counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Margaret F. Catalano as counsel pro hac vice to represent Plaintiff in this matter.

11 Civ. 3567 (LAK)

Civil Action

ECF Case

**DECLARATION OF ANN  
ODELSON IN SUPPORT OF  
MOTION TO ADMIT  
MARGARET F. CATALANO PRO  
HAC VICE**

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Ms. Catalano since February, 2001.
4. Ms. Catalano is a Member at Carroll, McNulty & Kull LLC in Basking Ridge, New Jersey.
5. I have found Ms. Catalano to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. A Certificate of Good Standing on behalf of Margaret F. Catalano for the State of New Jersey is attached hereto as Exhibit A.
7. A Certificate of Good Standing on behalf of Margaret F. Catalano for the United States Court of Appeals for the Fourth Circuit is attached hereto as Exhibit B.
8. Accordingly, I am please to move the admission of Margaret F. Catalano, pro hac vice.
9. I respectfully submit a proposed order granting the admission of Margaret F. Catalano, pro hac vice, which is attached hereto as Exhibit C.

WHEREFORE, it is respectfully requested that the motion to admit Margaret F. Catalano, pro hac vice, to represent Plaintiff in the above-captioned matter, be granted.

Respectfully submitted,



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Ann Odelson, Esq. (AO9681)  
Carroll, McNulty & Kull LLC  
570 Lexington Avenue, 8<sup>th</sup> Floor  
New York, New York 10022  
(646) 625-4000 (telephone)  
(646) 625-4044 (fax)  
email: [aodelson@cmk.com](mailto:aodelson@cmk.com)

Dated: July 7, 2011  
New York, New York

# EXHIBIT A

# Supreme Court of New Jersey



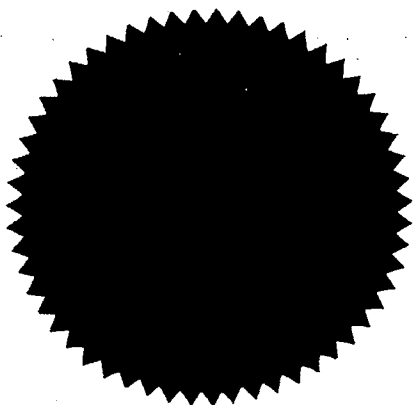
## Certificate of Good Standing

*This is to certify that* **MARGARET FLANNERY CATALANO**  
(No. **034321985**) *was constituted and appointed an Attorney at Law of New*  
*Jersey on* **December 23, 1985** *and, as such,*  
*has been admitted to practice before the Supreme Court and all other courts of this State*  
*as an Attorney at Law, according to its laws, rules, and customs.*

*I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.*

*Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.*

*In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this*  
**1ST** *day of* **July** *, 20* **11**



*Mark [Signature]*  
Clerk of the Supreme Court



# EXHIBIT B



## **CERTIFICATE OF GOOD STANDING**

I, Patricia S. Connor, Clerk of this Court, certify that Margaret F. Catalano was duly admitted to practice in this Court on May 3, 2011, and is in good standing in this Court.

Dated at Richmond, Virginia, on July 1, 2011

Patricia S. Connor  
CLERK

*Margaret F. Catalano*  
DEPUTY CLERK

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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COMPANY,

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11 Civ. 3567 (LAK)

**ORDER FOR ADMISSION PRO  
HAC VICE ON WRITTEN  
NOTICE**

Civil Action

ECF Case

Upon the motion of Ann Odelson, Esq., attorney for Plaintiff Tudor Insurance Company, and said  
sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Margaret F. Catalano, Esq.

Firm Name: Carroll, McNulty & Kull L.L.C.

Address: 120 Mountain View Boulevard  
P.O. Box 650

City/State/Zip: Basking Ridge, New Jersey 07920

Phone Number: (908) 848-6300

Fax Number: (908) 848-6310

is admitted to practice *pro hac vice* as counsel for Plaintiff Tudor Insurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: July \_\_, 2011  
New York, New York

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Lewis A. Kaplan, U.S.D.J.